



REMARKS

Claims 27-52 are pending in the application. These claims were rejected as follows:

Claims / Section	35 U.S.C. Sec.	References / Notes
27-29, 35-40, 42-44, 46-50 and 52	§102(e) Anticipation	<ul style="list-style-type: none">• Pullen (U.S. Patent No. 5,867,221).
30-34, 45	§103(a) Obviousness	<ul style="list-style-type: none">• Pullen (U.S. Patent No. 5,867,221); and• Girod (U.S. Patent No. 5,854,858).
41, 51	§103(a) Obviousness	<ul style="list-style-type: none">• Pullen (U.S. Patent No. 5,867,221); and• Kwan (U.S. Patent No. 5,910,827).

5 Applicant thanks the Examiner for his time in conducting the telephone interview in the above case. Based on this interview and the previous OA, Applicant has amended all independent claims in the application, and has provided discussion below distinguishing the newly amended claims from the art of record.

10 In each of the claims, a limitation has been added that indicates that the grouping of picture elements is based on a mathematically defined region of the digitized image derived solely from the digitized image itself.

 This limitation creates an important distinction over the primary reference cited, Pullen, because, according to Pullen at 3/1-6, "The preferred application of the present invention is for compressing frames of a video sequence, although the
15 system and method may be used to lossy compress any set of related data sets."

Thus, Pullen requires the presence of multiple sets of information in order to perform its compression on any particular single set. This is clearly the basis of the Pullen disclosure, whereby it is the differences between the frames (sets) that define the regions to be modified, and the basis of the ability to compress the information is due to consistency between portions of related frames (sets). The amended claim language makes it clear that the compression can be performed on a single frame/set of data without the use of or requirement of additional frames of information—this is neither taught nor obviated by the disclosure of Pullen.

The remaining references of record are cited for reasons not related to the additional limitation made to the independent claims. Kwan was cited as disclosing the use of the H.245 standard along with the H.263 standard. Girod was cited as teaching the use of low-pass image filtering. Applicants respectfully contend that neither Kwan nor Girod in alone or in combination with Pullen teach or suggest an element as amended in this response.

For this reason, the Applicants assert that the amended claim language clearly distinguishes over the prior art, and respectfully requests that the Examiner withdraw the 35 U.S.C. §§102 and 103 rejections from the present application.

CONCLUSION

Inasmuch as each of the rejections have been overcome by the amendments and arguments presented, and all of the examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, PO Box 1450, Alexandria, VA 22313-1450 on November 26, 2003.

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